

RCRA Inspection Report

US EPA RECORD CENTER REGION 5



587889

I.1
11/11/85Identification Number: M I D 006537336Installation Name: Daelyte Service Co.Location Address: 1356 Mt. ElliottCity: Detroit State: MI 48207Date of inspection: 1-11-85 Time of inspection (from) 1:00 (to) 1:30
1-15-85 9:30 10:15

Person(s) interviewed

Title

Telephone

Jeff BoutellSupervisor313-568-1910Horace BoutellOwnerInspector(s)
Kenneth Lee DarnellAgency/Title
DNR, H&D/Env. Eng.Telephone
313-459-9180Installation Activity (mark only one box)Inspection Form(s)☐ Treatment/Storage/Disposal per 40 CFR 265.11 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☒ Generation only

B

☐ Transportation only

C

INSPECTION FORM B

Daelyte

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

| | Yes | No | NI* | Remarks |
|--|-----|-------------------------------------|-------------------------------------|---------|
| (1) Does the generator have copies of the manifest available for review? 262.40 | | <input checked="" type="checkbox"/> | | |
| (2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. _____ | | | | |
| (3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements) | | | | |
| a. Manifest document number? | | | | |
| b. Name, mailing address, telephone number, and EPA ID number of generator? | | | | |
| c. Name and EPA ID number of transporter(s)? | | | | |
| d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility? | | | | |
| e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | | | | |
| f. The total quantity of waste(s) and the type and number of containers loaded? | | | | |
| g. Required certification? | | | | |
| h. Required signatures? | | | <input checked="" type="checkbox"/> | |
| (4) Reportable exceptions 262.42 | | | | |
| a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____ | | | | |
| b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____ | | | | |

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

| | Yes | No | NI | Remarks |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------|
| Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (3) If required, are placards available to transporter? 262.33 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| ** (4) Pre-shipment Accumulation: | | | | |
| ** Applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site. | | | | |
| a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| i. Is each container clearly marked with the date on which the period of accumulation began? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| ii. Have more than 90 days elapsed since the dates marked? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1 year in storage |
| iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?" | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| iv. Are containers in good condition? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| v. Are containers compatible with waste in them? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| vi. Are containers managed to prevent leaks? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| vii. Are containers stored closed? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not in shop area |
| viii. Are containers inspected weekly for leaks and defects? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ignitable |

| | Yes | No | NI | Remarks |
|--|-----|----|----|------------------------|
| x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) | | | ✓ | No incompatible wastes |
| xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | | | ✓ | |
| b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision) | | ✓ | | |
| i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision) | | | | |
| ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 | | | | |
| iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? | | | | |
| iv. Do continuous feed systems have a waste-feed cutoff? | | | | |
| v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 | | | | |
| vi. Are required daily and weekly inspections done? 265.194 | | | | |
| vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198 | | | | |
| viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199 | | | | |

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

_____ ✓ _____

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

- i. Job Titles?
ii. Job Descriptions?
iii. Description of training?
iv. Records of training?
v. Did personnel receive the required training by 5-19-81?
vi. Do new personnel receive required training within six months?
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

_____ ✓ _____ No personnel training records
_____ ✓ _____
_____ ✓ _____
_____ ✓ _____
_____ ✓ _____
_____ ✓ _____
_____ ✓ _____

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

_____ ✓ _____

| | Yes | o | NI | Remarks |
|---|-----|---|----|------------|
| ii. If required, does this facility have the following equipment: 265.32 | | | | Telephone |
| Internal communications or alarm systems? | ✓ | — | — | Fire alarm |
| Telephone or 2-way Radios at the scene of operations? | ✓ | — | — | |
| Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | ✓ | — | — | |

Indicate the volume of water and/or foam available for fire control:

6 fire extinguisher

iii. Testing and Maintenance of Emergency Equipment: 265.33

| | | | | |
|--|---|---|---|--------------------------------------|
| Has the owner or operator established testing and maintenance procedures for emergency equipment? | — | — | ✓ | have Sand only for emergencies |
| Is emergency equipment maintained in operable condition? | — | — | ✓ | |
| iv. Has owner/operator provided immediate access to internal alarms (if needed)? | ✓ | — | — | |
| v. Is there adequate aisle space for unobstructed movement? | ✓ | — | — | |
| vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? | ✓ | — | — | Fire department Police department |

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

| | | | | |
|--|---|---|---|-------------------------------|
| i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52 | — | ✓ | — | Don't have a contingency plan |
|--|---|---|---|-------------------------------|

| | Yes | No | NI | Remarks |
|--|-----|----|----|---------|
| ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37? | — | — | — | — |
| iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator. | — | — | — | — |
| iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities? | — | — | — | — |
| v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?) | — | — | — | — |
| vi. Are copies of the Contingency Plan available at site and local emergency organizations? | — | — | — | — |
| vii. Is the facility emergency coordinator identified? | — | — | — | — |
| viii. Is coordinator familiar with all aspects of site operation and emergency procedures? | — | — | — | — |
| ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? | — | — | — | — |
| x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56? | — | — | — | — |

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- 1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

— ☒ — None done

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

— ☒ — — —

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

— — — ☒ — — —

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

— — — ☒ — — —

iii. Met the Manifest requirements?

— — — ☒ — — —

b. Importing Hazardous Waste, has the generator met the manifest requirements?

— — — ☒ — — —

arks: Waste Solvent mixed with paint.